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5 Attorney for Defendant Eric Burton Benson

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 ERIC BURTON BENSON,

15 Defendant
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) Case No.: CR-12-00480 YGR (KAW)

) **STIPULATION AND ~~[PROPOSED]~~**
) **ORDER MODIFYING BAIL**
) **CONDITIONS**

1 The parties hereby stipulate and move this Court to enter an order modifying the
2 defendant Eric Benson's release conditions to allow him to travel freely within the United
3 States.

4 On August 6, 2012, Mr. Benson was arraigned and pled not guilty to charges of
5 wire fraud, conspiracy, theft from an employee pension benefit plan, bank fraud, and
6 money laundering. Mr. Benson was released on an unsecured bond of \$100,000. His
7 current release conditions limit his travel to the Northern District of California, although
8 the court has modified his release conditions on several occasions to permit travel outside
9 the Northern District.

10 Counsel for Defendant represents that Mr. Benson is an officer in the United
11 States Navy Reserves who specializes in explosive ordnance disposal. Approximately
12 once a month during the current fiscal year, Mr. Benson is expected to participate in
13 training drills in the San Diego or China Lake regions of California. Future drills may be
14 conducted at other locations in the United States. Mr. Benson also hopes to travel to
15 Navy and other military bases and installations in the United States to participate in joint
16 professional military education courses. In addition, Mr. Benson seeks to travel to
17 Washington, DC during the period October 25 through October 31, 2012, in order to
18 participate in the Marine Corps Marathon.

19 Mr. Benson has fully complied with all release conditions to date. Counsel for the
20 United States does not object to this request to modify Mr. Benson's release conditions to
21 permit him to travel freely within the United States. The assigned pretrial services
22 officer, Amaryllis Gonzalez, has been informed of this request.

23 Mr. Benson's next court appearance is set for December 6, 2012, at 2:00 p.m.
24 before Judge Gonzalez Rogers.

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26 Dated:

Respectfully Submitted,

27 LAW OFFICE OF WILLIAM H.
28 KIMBALL

//s//

WILLIAM H. KIMBALL
ATTORNEY FOR ERIC BENSON

MELINDA L. HAAG
US ATTORNEY

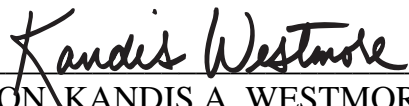
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WADE M. RHYNE
ASSISTANT US ATTORNEY

GOOD CAUSE HAVING BEEN SHOWN, Defendant's conditions of pretrial release are hereby modified to permit him to travel freely within the United States for military duties, education and training programs with prior approval of and as directed by Pretrial Services. All other conditions of release shall remain in effect.

IT IS SO ORDERED.

Dated: 10/22/12


HON. KANDIS A. WESTMORE
US MAGISTRATE JUDGE